



CITY OF WATSONVILLE
CITY UTILITIES CUSTOMER SERVICE DIVISION
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DATE:

9/9/99

TO:

TODD THOMPSON

S.W.R.C.B.

FROM:

BOB GEYER - 831-728-6149

NUMBERS OF PAGES INCLUDING COVER:

3

COMMENTS:

CITY OF WATSONVILLE

"Opportunity through diversity; unity through cooperation"



September 1, 1999

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 Second Floor
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 Mayor &
 City Council
 (831) 728-6133
 City Manager
 728-6011
 City Attorney
 728-6011
 City Clerk
 728-6005
 Personnel
 728-6012

City Hall Offices
 250 Main Street
 Community
 Development
 728-6018
 728-6020
 Fax 728-6011
 Finance
 728-6021
 Fax 763-4060
 Public Works &
 Utilities
 728-6047
 Fax 763-4060
 Purchasing
 728-6027
 Fax 763-4060

Airport
 160 Aviation Way
 728-6075
 Fax 763-4060

Fire
 115 Second Street
 728-6036
 Fax 763-4060

Housing & Economic
 Development
 231 Union Street
 728-6011
 Fax 763-4060

Library
 310 Union Street
 728-6040
 Fax 763-4060

Parks & Recreation
 30 Maple Street
 728-6081
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Todd Thompson
 Associate Water Resource Control Engineer
 Division of Water Quality
 State Water Resources Control Board
 P.O. Box 944213
 Sacramento, CA 94244-2130

Dear Mr. Thompson,

On behalf of the City of Watsonville we would like to submit the following comments on the draft EIR for General Waste Discharge Requirements for Biosolids Land Application. Overall, the EIR seems thorough and fair. However, the City opposes excluding the California Coastal Zone from the EIR (p. 2-16). Many of the agencies financing this project (including the City of Watsonville) are located within or very near the Coastal Zone, and can expect to have potential land application projects in this area.

Over the past 7 years the City of Watsonville has very successfully land applied biosolids on erosion control projects within the Coastal Zone thereby beneficially reusing it's biosolids. As one of the financial contributors funding this EIR, the City understood that the EIR would cover the entire State. By not including the Coastal Zone, a significant portion of our local farmland has been excluded, and the possibilities for future projects limited.

The City acknowledges that additional regulatory constraints exist within the Coastal Zone, and that the General Order may not address all issues of concern. If, however, the EIR was to include the Coastal Zone, individual agencies wishing to land apply biosolids in the Coastal Zone would have a basic environmental review to work from, and the additional permitting requirements could be significantly reduced.

19-1

Please consider including the Coastal Zone in this EIR. It would allow many agencies in the State additional opportunities for beneficial reuse of biosolids through land application, and would be a more equitable use of the study funds.

↑ 19-1
(cont)

Sincerely,



David Koch
Director of Public Works and Utilities

Responses to Comments from the City of Watsonville, City Utilities Customer Service Division

- 19-1. The California Coastal Zone has been excluded because of the additional regulatory constraints and other special considerations associated with it. The EIR still affords environmental review work that is beneficial for sites not applicable to the proposed GO by identifying potential impacts and mitigation. These issues can be used in subsequent environmental documentation for sites within the excluded areas.